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14		
1.5	UNITED STATES DIS	
15	UNITED STATES DE	STRICT COURT
15 16	DISTRICT OF	
		NEVADA
16	DISTRICT OF	
16 17	DISTRICT OF MORGAN RUSSELL,	NEVADA
16 17 18	DISTRICT OF MORGAN RUSSELL, Plaintiff, vs. NISSAN MOTOR CO., LTD., NISSAN	NEVADA Case No. 2:16-cv-00458-JCM-VCF
16 17 18 19	DISTRICT OF MORGAN RUSSELL, Plaintiff, vs. NISSAN MOTOR CO., LTD., NISSAN NORTH AMERICA, INC.; AUTOLIV JAPAN LTD.; AUTOLIV ELECTRONICS	NEVADA
16 17 18 19 20	DISTRICT OF MORGAN RUSSELL, Plaintiff, vs. NISSAN MOTOR CO., LTD., NISSAN NORTH AMERICA, INC.; AUTOLIV JAPAN LTD.; AUTOLIV ELECTRONICS ASIA PACIFIC: TAKATA	NEVADA Case No. 2:16-cv-00458-JCM-VCF JOINT MOTION TO DISMISS
16 17 18 19 20 21	DISTRICT OF MORGAN RUSSELL, Plaintiff, VS. NISSAN MOTOR CO., LTD., NISSAN NORTH AMERICA, INC.; AUTOLIV JAPAN LTD.; AUTOLIV ELECTRONICS ASIA PACIFIC; TAKATA CORPORATION; TK HOLDINGS, INC.; GARFF-WARNER NISSAN D/B/A KEN GARFF NISSAN OF SALT LAKE; GARFF-	NEVADA Case No. 2:16-cv-00458-JCM-VCF JOINT MOTION TO DISMISS
16 17 18 19 20 21 22	DISTRICT OF MORGAN RUSSELL, Plaintiff, vs. NISSAN MOTOR CO., LTD., NISSAN NORTH AMERICA, INC.; AUTOLIV JAPAN LTD.; AUTOLIV ELECTRONICS ASIA PACIFIC; TAKATA CORPORATION; TK HOLDINGS, INC.; GARFF-WARNER NISSAN D/B/A KEN GARFF NISSAN OF SALT LAKE; GARFF-) WARNER AUTOMOTIVE GROUP, LLC; GARFF AUTOMOTIVE GROUP, LLC;	NEVADA Case No. 2:16-cv-00458-JCM-VCF JOINT MOTION TO DISMISS
16 17 18 19 20 21 22 23	MORGAN RUSSELL, Plaintiff, vs. NISSAN MOTOR CO., LTD., NISSAN NORTH AMERICA, INC.; AUTOLIV JAPAN LTD.; AUTOLIV ELECTRONICS ASIA PACIFIC; TAKATA CORPORATION; TK HOLDINGS, INC.; GARFF-WARNER NISSAN D/B/A KEN GARFF NISSAN OF SALT LAKE; GARFF-) WARNER AUTOMOTIVE GROUP, LLC; GARFF AUTOMOTIVE GROUP, LLC; DOE INDIVIDUALS 1 through 100; ROE BUSINESS ENTITIES 1 through 100,	NEVADA Case No. 2:16-cv-00458-JCM-VCF JOINT MOTION TO DISMISS
16 17 18 19 20 21 22 23 24	MORGAN RUSSELL, Plaintiff, vs. NISSAN MOTOR CO., LTD., NISSAN NORTH AMERICA, INC.; AUTOLIV JAPAN LTD.; AUTOLIV ELECTRONICS ASIA PACIFIC; TAKATA CORPORATION; TK HOLDINGS, INC.; GARFF-WARNER NISSAN D/B/A KEN GARFF NISSAN OF SALT LAKE; GARFF-) WARNER AUTOMOTIVE GROUP, LLC; GARFF AUTOMOTIVE GROUP, LLC; DOE INDIVIDUALS 1 through 100; ROE BUSINESS ENTITIES 1 through 100, inclusive,	NEVADA Case No. 2:16-cv-00458-JCM-VCF JOINT MOTION TO DISMISS
16 17 18 19 20 21 22 23 24 25	MORGAN RUSSELL, Plaintiff, vs. NISSAN MOTOR CO., LTD., NISSAN NORTH AMERICA, INC.; AUTOLIV JAPAN LTD.; AUTOLIV ELECTRONICS ASIA PACIFIC; TAKATA CORPORATION; TK HOLDINGS, INC.; GARFF-WARNER NISSAN D/B/A KEN GARFF NISSAN OF SALT LAKE; GARFF-) WARNER AUTOMOTIVE GROUP, LLC; GARFF AUTOMOTIVE GROUP, LLC; DOE INDIVIDUALS 1 through 100; ROE BUSINESS ENTITIES 1 through 100,	NEVADA Case No. 2:16-cv-00458-JCM-VCF JOINT MOTION TO DISMISS

1	Pursuant to Federal Rule of Civil Procedure 41, Plaintiff and Defendants Nissan North
2	America, Inc., Nissan Motor Co., Ltd., Garff-Warner Nissan of SLC, LLC dba Ken Garff
3	Nissan of Salt Lake, hereby move this Court to dismiss this action with prejudice, each side
4	to bear their own costs and attorneys' fees.
5	DATED this 3 day of 4 , 2017.
6	MAINOR WIRTH, LLP
7	
8	By:
9	DANIELLE TARMU, ESQ. Nevada Bar No. 11727
10	KATIE E. GOLDBERG, ESQ. Nevada Bar No. 13493
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16	By: CURTIS J. BUSBY, ESQ.
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27	Attorneys for Defendants Nissan North America, Inc., Nissan Motor Co., Ltd., and Garff-Warner Nissan of
28	SLC, LLC dba Ken Garff Nissan of Salt Lake

1	CERTIFICATE OF SERVICE
2	I hereby certify that on <u>Ole 38</u> , 2017, I electronically transmitted the
3	attached document to the Clerk's Office using the CM/ECF System for filing and
4	transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:
5	Danielle Tarmu, Esq.
6	Danielle Tarmu, Esq. Katie E. Goldberg, Esq. MAINOR WIRTH, LLP 6018 S. Ft. Apache Road
7	Suite 150 Las Vegas, NV 89148
8	Attorneys for Plaintiff
9	S Avin
10	
11	An Employee of ALVERSON, TAYLOR, MORTENSEN & SANDERS
12	
13	
14	IT IS SO ORDERED:
15	
16	Xellus C. Mahan
17	UNITED STATES DISTRICT JUDGE
18	December 29, 2017
19	Dated:
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